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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
Plaintiffs,)
v.)
U.S. DEPARTMENT OF EDUCATION and)
Suzanne GOLDBERG, in her official capacity as)
Acting Assistant Secretary for Civil Rights,)
U.S. Department of Education,)
Defendants.)

Case No. 6:21-cv-00474-AA

**DECLARATION OF PAUL
CARLOS SOUTHWICK**

I, Paul Carlos Southwick, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. Exhibit A is Email Correspondence with Seth Galanter (former Principal Deputy Assistant Secretary for Civil Rights in the Department of Education).
3. Exhibit B is Comment by Seth Galanter (former Principal Deputy Assistant Secretary for Civil Rights in the Department of Education) to Assistant Secretary Marcus RE: Proposed Rule 34 C.F.R. § 106.12(c).
4. Exhibit C is Twitter Posts (detailing stories of discrimination and LGBTQ+ student suicides at NFBCUs).

5. Exhibit D is *Christian College President Compares LGBT Students to Members of ISIS* (March 19, 2018); *LGBT BYU students fighting suicide while facing unique mental health challenges* (Nov. 11, 2016); *Students: BYU Honor Code leaves LGBT victims of sexual assault vulnerable and alone* (July 29, 2017).

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 17th day of August, 2021.

By: s/Paul Carlos Southwick
Paul Carlos Southwick